

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

THE BAVARIAN, A CONDOMINIUM, a  
Washington non-profit corporation,

Plaintiff,

v.

COUNTRY MUTUAL INSURANCE  
COMPANY, an Illinois Corporation; and DOE  
INSURANCE COMPANIES 1–10,

Defendants.

NO. 2:25-cv-00493-JHC

STIPULATED MOTION & ORDER TO  
EXTEND INITIAL SCHEDULING DATES

**I. MOTION**

Come now, Plaintiff The Bavarian, a Condominium (“Association”) and Defendant Country Mutual Insurance Company (“Country Mutual”), by and through their respective counsel, stipulate to this second Motion to Extend Initial Scheduling Dates. The purpose of the extension is to allow the parties to discuss whether the parties will agree to stay the proceedings to allow time for Country Mutual to issue a coverage determination.

Counsel for the Association and Country Mutual have met and conferred and propose a thirty-day extension of the Deadlines for the FRCP 26(f) Conference, Initial Disclosures Pursuant to FRCP 26(a)(1), and Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f). The new proposed deadlines are set forth below:

	New Proposed Deadline
Deadline for FRCP 26(f) Conference	08/02/2025
Initial Disclosures Pursuant to FRCP 26(a)(1)	08/17/2025
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	08/24/2025

## II. GOOD CAUSE SHOWN

Pursuant to LR 16(b)(6) a scheduling order may be modified “only for good cause and with the judge’s consent.” Good cause exists here because the parties are conferring regarding a potential motion to stay these proceedings while Country Mutual comes to a coverage determination. This extension is not made for purposes of delay, but rather to permit the parties to have the ability to meaningfully participate in the Fed. R. Civ. P. 26(f) conference, prepare and exchange initial disclosures, and together draft and approve a Joint Status Report.

The parties respectfully request that the Court extend the currently scheduled deadlines as set forth above. A proposed order is included herewith.

We certify that this memorandum contains 265 words, in compliance with the Local Civil Rules.

DATED this 2<sup>nd</sup> day of July, 2025.

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**ORDER**

Based on the above stipulation, IT IS SO ORDERED that the deadlines set forth in the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt. #4) are extended as follows:

	New Deadline
Deadline for FRCP 26(f) Conference	08/02/2025
Initial Disclosures Pursuant to FRCP 26(a)(1)	08/17/2025
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	08/24/2025

DATED THIS 2nd day of July, 2025.

  
JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE